

HINSHAW

& CULBERTSON LLP

ATTORNEYS AT LAW

780 Third Avenue
4th Floor
New York, NY 10017-2024

212-471-6200
212-935-1166 (fax)
www.hinshawlaw.com

Honorable Viktor V. Pohorelsky
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Joel Schwartz, et al. v. Credit Protection Association, L.P.*,
Case No. 12-cv-04602-JP-VVP (JG)(VVP)

Dear Judge Pohorelsky:

We represent Credit Protection Association, L.P. ("CPA") in the above-referenced matter. We write to advise the Court that we were not aware of today's initial conference and apologize for not appearing. However, we also respectfully note for the record that the Court had ordered Plaintiff's counsel, Maxim Maximov, to ensure that "...all counsel are aware of their obligation to appear" for today's conference as reflected in the docket. *See* Scheduling Order, dated October 2, 2012.

As the docket also reflects, CPA did not appear in this action until January 7, 2013. Between January 8, 2013 and January 10, 2013, we had been exchanging emails with Mr. Maximov to seek his consent for an enlargement of time to respond to the Complaint. Mr. Maximov even provided us with a settlement demand. In none of those communications did Mr. Maximov inform us that there was an upcoming initial conference. He also did not discuss with us discovery dates which the parties can discuss and mutually propose to the Court. Finally, on February 11, 2013, we wrote a letter to Mr. Maximov asking him to consider withdrawing some of Plaintiff's claims which have no factual basis and which are clearly rebutted by the evidence. Indeed, in that letter, we advised Mr. Maximov of his Rule 11 obligations and provided him the opportunity to both respond to our letter and/or amend the Complaint by February 25, 2013. It seemed an opportune time for Mr. Maximov to advise us of today's conference so that the parties can raise these issues with the Court.

Based on the foregoing circumstances and the communications between counsel, we were surprised – to say the least – that the initial conference in this matter is scheduled today. Consequently, we were unable to attend and also unable to provide any input to the Court regarding our scheduling concerns as well as the more substantive concern with respect to the good faith basis of certain of Plaintiff's claims.

130521232v1 2716

Honorable Viktor V. Pohorelsky

February 13, 2013

Page 2

For these reasons, we respectfully request that the Court amend the notation in today's Minute Entry to excuse Defendant's absence. In addition, based on Defendant's concern regarding the validity of certain claims by Plaintiff that clearly lack any factual basis and which may be a basis for a motion, we respectfully request that Paragraph 3(c) of the Scheduling Order be amended to shorten the time for Plaintiff to amend his pleadings to March 15, 2013.

We thank the Court for its consideration in this matter.

Respectfully submitted,

HINSHAW & CULBERTSON LLP

By: s/Concepcion A. Montoya

Concepcion Montoya (CM-7147)

780 Third Avenue, 4th Floor

New York, NY 10017

(212) 471-6200

*Attorneys for Defendant Credit Protection
Association, L.P.*

TO: Maxim Maximov, Esq. (Via ECF)

**U.S. District Court
Eastern District of New York (Brooklyn)
CIVIL DOCKET FOR CASE #: 1:12-cv-04602-JG-VVP**

Schwartz v. Credit Protection Association L.P.
Assigned to: Judge John Gleeson
Referred to: Magistrate Judge Viktor V. Pohorelsky
Cause: 15:1692 Fair Debt Collection Act

Date Filed: 09/13/2012
Jury Demand: Plaintiff
Nature of Suit: 480 Consumer Credit
Jurisdiction: Federal Question

Plaintiff

Joel Schwartz
*on behalf of himself and all other similarly
situated consumers*

represented by **Marcy Einhorn**
Marcy Einhorn, Esq.
15 Stuyvesant Oval 4H
15 Stuyvesant Oval 4h
New York, NY 10009
(212)777-2784
Fax: (718)408-9570
Email: marcyesque@gmail.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Maxim Maximov
Maxim Maximov, LLP
1600 Avenue M.
2nd Flr.
Brooklyn, NY 11230
(718) 395-3459
Fax: (718) 408-9570
Email: m@maximovlaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

Credit Protection Association L.P.

represented by **Concepcion A. Montoya**
Hinshaw & Culbertson LLP
780 Third Avenue
4th Floor
New York, NY 10017
212-471-6200
Fax: 212-935-1166
Email: cmontoya@hinshawlaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

| Date Filed | # | Docket Text |
|------------|----------|--|
| 09/13/2012 | <u>1</u> | COMPLAINT against Credit Protection Association L.P. Disclosure Statement on Civil Cover Sheet completed -Yes,, filed by Joel Schwartz. (Attachments: # <u>1</u> Civil Cover Sheet) (Davis, Kimberly) (Entered: 09/18/2012) |
| 09/13/2012 | | FILING FEE: \$ 350.00, receipt number 4653048959 (Davis, Kimberly) (Entered: 09/18/2012) |
| 09/18/2012 | <u>2</u> | In accordance with Rule 73 of the Federal Rules of Civil Procedure and Local Rule 73.1, the parties are notified that <i>if</i> all parties consent a United States magistrate judge of this court is available to conduct all proceedings in this civil action including a (jury or nonjury) trial and to |

| | | |
|------------|----------|--|
| | | order the entry of a final judgment. Attached to the Notice is a blank copy of the consent form that should be filled out, signed and filed electronically only if all parties wish to consent . The form may also be accessed at the following link: http://www.uscourts.gov/uscourts/FormsAndFees/Forms/AO085.pdf . You may withhold your consent without adverse substantive consequences. Do NOT return or file the consent unless all parties have signed the consent. (Davis, Kimberly) (Entered: 09/18/2012) |
| 10/02/2012 | | SCHEDULING ORDER: An initial conference will be held in this case on February 13, 2013 at 10:00 a.m. before Viktor V. Pohorelsky, United States Magistrate Judge in Courtroom 13A of the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York. All parties are directed to make the disclosures required by Rules 26(a)(1) of the Federal Rules of Civil Procedure no later than <u>five days before</u> the conference. All counsel are required to attend, and plaintiff's counsel is directed to ensure that all counsel are aware of their obligation to appear. Any requests for adjournment must be made in writing on notice to opposing parties, and must disclose whether or not all parties consent. No request for adjournment will be considered unless made at least forty-eight (48) hours before the scheduled conference. Ordered by Magistrate Judge Viktor V. Pohorelsky on 10/2/2012. (Newton, Joan) (Entered: 10/02/2012) |
| 10/03/2012 | | Case Ineligible for Arbitration (Credle, Rita) (Entered: 10/03/2012) |
| 10/26/2012 | | Summons Issued as to Credit Protection Association L.P.. (Klein, Vivian) (Entered: 10/26/2012) |
| 11/27/2012 | <u>3</u> | NOTICE of Appearance by Marcy Einhorn on behalf of Joel Schwartz (aty to be noticed) (Einhorn, Marcy) (Entered: 11/27/2012) |
| 12/10/2012 | <u>4</u> | SUMMONS Returned Executed by Joel Schwartz. Credit Protection Association L.P. served on 12/3/2012, answer due 12/26/2012. (Maximov, Maxim) (Entered: 12/10/2012) |
| 01/07/2013 | <u>5</u> | MOTION for Extension of Time to File Answer to <i>Plaintiff's Class Action Complaint</i> by Credit Protection Association L.P.. (Montoya, Concepcion) (Entered: 01/07/2013) |
| 01/09/2013 | | SET DEADLINE: Any response to defendant <u>5</u> Motion to Extend Time is due by January 14, 2013. Ordered by Magistrate Judge Viktor V. Pohorelsky on 1/9/2013. Ordered by Judge Pohorelsky on 1/9/13. (Newton, Joan) (Entered: 01/09/2013) |
| 01/15/2013 | | ORDER granting <i>nunc pro tunc</i> <u>5</u> Motion for Extension of Time to Answer. Credit Protection Association L.P. answer due 1/25/2012. Ordered by Magistrate Judge Viktor V. Pohorelsky on 1/15/2013. (Newton, Joan) (Entered: 01/15/2013) |
| 01/25/2013 | <u>6</u> | Corporate Disclosure Statement by Credit Protection Association L.P. identifying Corporate Parent Etan General, Inc., for Credit Protection Association L.P.. (Montoya, Concepcion) (Entered: 01/25/2013) |
| 01/25/2013 | <u>7</u> | ANSWER to <u>1</u> Complaint by Credit Protection Association L.P.. (Montoya, Concepcion) (Entered: 01/25/2013) |
| 02/13/2013 | <u>8</u> | MINUTE ENTRY for Initial Pretrial Conference held on 2/13/13 before Magistrate Judge Viktor V. Pohorelsky: Scheduling order entered setting deadlines for discovery and other pretrial proceedings. A status conference will be held by telephone on May 3, 2013 at 4:30 p.m., to be initiated by counsel for the plaintiff. (Newton, Joan) (Entered: 02/13/2013) |

| PACER Service Center | | | |
|----------------------|---------------|------------------|----------------------|
| Transaction Receipt | | | |
| 02/13/2013 15:45:12 | | | |
| PACER Login: | hc0185 | Client Code: | |
| Description: | Docket Report | Search Criteria: | 1:12-cv-04602-JG-VVP |
| Billable Pages: | 2 | Cost: | 0.20 |

Jason J. Oliveri/HC31
01/07/2013 09:09 AM

To m@maximovlaw.com
cc
bcc
Subject Schwartz v. Credit Protection Association, L.P.

Dear Mr. Maximov,

As I mentioned in my voicemail to you on Friday, my firm was recently retained to represent Credit Protection Association, L.P. As I also mentioned, we are seeking your consent for an enlargement of time to answer the plaintiff's complaint. Please call me to discuss at your earliest convenience.

Thank you,

Jason J. Oliveri, Esq.

780 Third Avenue 4th Floor, New York, NY 10017
Tel: 212-471-6200 | Fax: 212-935-1166
E-mail: JOliveri@hinshawlaw.com

HINSHAW
& CULBERTSON LLP



Maxim Maximov
<m@maximovlaw.com>
01/08/2013 10:59 PM

To JOliveri@hinshawlaw.com
cc
bcc
Subject Re: Schwartz v. Credit Protection Association, L.P.

History:  This message has been replied to and forwarded.

Jason,

You can have a two week extension.

Maxim Maximov, Esq.

Maxim Maximov, LLP

1600 Ave M, Second Floor

Brooklyn, New York 11230

Phone: 718-395-3459

Fax: 718-408-9570

On Mon, Jan 7, 2013 at 9:09 AM, <JOliveri@hinshawlaw.com> wrote:

Dear Mr. Maximov,

As I mentioned in my voicemail to you on Friday, my firm was recently retained to represent Credit Protection Association, L.P. As I also mentioned, we are seeking your consent for an enlargement of time to answer the plaintiff's complaint. Please call me to discuss at your earliest convenience.

Thank you,

Jason J. Oliveri, Esq.

780 Third Avenue 4th Floor, New York, NY 10017

Tel: 212-471-6200 | Fax: 212-935-1166

E-mail: JOliveri@hinshawlaw.com

HINSHAW

& CULBERTSON LLP

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--

Best Regards,

Maxim Maximov, Esq.

Maxim Maximov, LLP

1600 Ave M, Second Floor

Brooklyn, New York 11230

Phone: 718-772-3954


Fax: 718-408-9570



Maxim Maximov
<m@maximovlaw.com>
01/10/2013 11:42 AM

To JOliveri@hinshawlaw.com
cc
bcc

Subject Re: Schwartz v. Credit Protection Association, L.P.

History:  This message has been replied to and forwarded.

Jason,

The partners the client and the co-counsel who will be joining us for class certification would all rather move forward as a class but if you client wants to settle on an individual basis the demand is \$8,350.

Kindly advise.

Maxim Maximov, Esq.

Maxim Maximov, LLP

1600 Ave M, Second Floor

Brooklyn, New York 11230

Phone: 718-395-3459

Fax: 718-408-9570

On Wed, Jan 9, 2013 at 6:25 PM, <JOliveri@hinshawlaw.com> wrote:

Maxim,

The Court has extended our time to answer the complaint to January 14, 2013. In the meantime, do you have an initial settlement demand? If you prefer to discuss by phone I should be in the office all day tomorrow.

Thank you,

Jason J. Oliveri, Esq.

780 Third Avenue 4th Floor, New York, NY 10017

Tel: 212-471-6200 | Fax: 212-935-1166

E-mail: JOliveri@hinshawlaw.com

HINSHAW
& CULBERTSON LLP

Maxim Maximov <m@maximovlaw.com>

01/08/2013 10:59 PM

To JOliveri@hinshawlaw.com

cc

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Maxim Maximov, LLP

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Brooklyn, New York 11230

Phone: 718-395-3459

Fax: 718-408-9570



Maxim Maximov
<m@maximovlaw.com>
02/07/2013 04:28 PM

To JOliveri@hinshawlaw.com
cc
bcc
Subject Re: Schwartz v. Credit Protection Association, L.P.

Jason,

I have not heard back regarding our settlement demand.

Kindly advise

Best Regards,

Maxim Maximov, Esq.

Maxim Maximov, LLP

1600 Ave M, Second Floor

Brooklyn, New York 11230

Phone: 718-772-3954

Fax: 718-408-9570

On Fri, Jan 11, 2013 at 1:25 PM, <JOliveri@hinshawlaw.com> wrote:

Maxim,

In one of the emails below I indicated that our answer was due on the 14th. In fact, your response to our request for an enlargement of time is due on the 14th.

Sorry for any confusion.

Jason J. Oliveri, Esq.

780 Third Avenue 4th Floor, New York, NY 10017

Tel: 212-471-6200 | Fax: 212-935-1166

E-mail: JOliveri@hinshawlaw.com

HINSHAW

& CULBERTSON LLP

Maxim Maximov <m@maximovlaw.com>

01/10/2013 11:42 AM

To JOliveri@hinshawlaw.com

cc

SubjectRe: Schwartz v. Credit Protection Association, L.P.

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Thank you,

Jason J. Oliveri, Esq.

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E-mail: JOliveri@hinshawlaw.com

HINSHAW

& CULBERTSON LLP

Maxim Maximov <m@maximovlaw.com>

01/08/2013 10:59 PM

To JOliveri@hinshawlaw.com

cc

SubjectRe: Schwartz v. Credit Protection Association, L.P.

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Maxim Maximov, Esq.

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Brooklyn, New York 11230

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Fax: 718-408-9570

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Thank you,

Jason J. Oliveri, Esq.

780 Third Avenue 4th Floor, New York, NY 10017

Tel: 212-471-6200 | Fax: 212-935-1166

E-mail: JOliveri@hinshawlaw.com

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& CULBERTSON LLP

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information contained in this communication or any attachments.

--

Best Regards,

Maxim Maximov, Esq.

Maxim Maximov, LLP

1600 Ave M, Second Floor

Brooklyn, New York 11230

Phone: 718-772-3954

Fax: 718-408-9570

--

Best Regards,

Maxim Maximov, Esq.

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1600 Ave M, Second Floor

Brooklyn, New York 11230

Phone: 718-772-3954

Fax: 718-408-9570

HINSHAW

& CULBERTSON LLP

February 11, 2013

VIA OVERNIGHT MAIL AND EMAIL

Mr. Maxim Maximov
1600 Avenue M, 2nd Floor
Brooklyn, NY 11230

ATTORNEYS AT LAW

780 Third Avenue
4th Floor
New York, NY 10017-2024

212-471-6200
212-935-1166 (fax)
www.hinshawlaw.com

**Re: Joel Schwartz, et al. v. Credit Protection Association, L.P.,
Case No. 12-cv-04602-JP-VVP**

Dear Mr. Maximov:

We represent Defendant Credit Protection Association, L.P. ("CPA") in the above-referenced litigation. In the Complaint, Plaintiff alleges that CPA is suspended from doing business in New York in violation of §§ 1692e, 1692e(2)(A), 1692e(5), 1692e(10) and 1692f of the Fair Debt Collection Practices Act ("FDCPA") because it "failed to publish ... any certificate of publication ... as required." (Complaint, ¶ 17). Enclosed please find the proof of publication as well as CPA's current license. In light of these documents, Plaintiff lacks any basis to continue pursuit of these claims and, therefore, voluntary dismissal of these claims is appropriate.

As you know, courts demand that that only claims founded in factual and legal basis be pursued. *Int'l Shipping Co., S.A. v. Hydra Offshore, Inc.*, 875 F.2d 388, 390 (2d Cir. 1989); cited in *Bibb v. New York City Hous. Auth.*, 2010 U.S. Dist. LEXIS 107723 (S.D.N.Y. 2010) (Rule 11 mandates sanctions "where it is clear that: (1) a reasonable inquiry into the basis for a pleading has not been made; (2) under existing precedents there is no chance of success; and (3) no reasonable argument has been advanced to extend, modify or reverse the law as it stands"). Further, courts have granted sanctions where claims were pursued without basis and therefore in bad faith. *Tucker v. The CBE Group, Inc.*, 2010 WL 1849034, at *3 (M.D. Fla. May 5, 2010); *Rhinehart v. The CBE Group, Inc.*, 2010 WL 2158282, at *2 (M.D. Fla. May 27, 2010). Should Plaintiff pursue this matter further, please be advised that CPA will explore all remedies available to it, including those provided by 28 U.S.C. §1927, Rule 11 of the Federal Rules of Civil Procedure, Section 1692k(a)(3) of the FDCPA, and all other appropriate remedies.

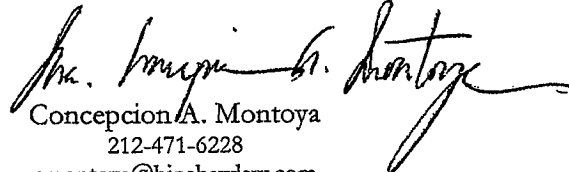
130514709v1 0942497

Mr. Maxim Maximov
February 11, 2013
Page 2

Please let us know how you intend to proceed by **February 25, 2013**. Thank you for your prompt attention to this matter.

Very truly yours,

HINSHAW & CULBERTSON LLP


Concepcion A. Montoya
212-471-6228
cmontoya@hinshawlaw.com

CAM:nb
Encls.

STATE OF NEW YORK

County of New York, s:

NOTICE OF APPLICATION
For Authority for Limited
Liability Partnership to do bus-
ness in New York State Name
Credit Protection Association
L.P. Authority filed in New
York State: October 23, 1998
Jurisdiction: Texas. Organized
July 23, 1997. New York State
Office Location: New York
County. Secretary of State of
New York has been designated
as agent of the limited partner-
ship upon whom process against
it may be served. The Secretary
of State may mail a copy of any
process against it served upon
him or her to: c/o
C.T. Corporation System, 1633
Broadway, New York, New
York 10019. C.T. Corporation
System, 1633 Broadway, New
York, New York 10019, is the
registered agent of the limited
partnership upon whom process
against it may be served. Prin-
cipal office: 13355 Noel Road,
Suite 2100, Dallas, Texas 75240.
The name and business or resi-
dence street address of each
general partner is available
from the Secretary of State. A
copy of the certificate is filed
with Secretary of State of Tex-
as, 1019 Brazos, Room 105, Aus-
tin, Texas 78701. Purpose:
Collection service letter writ-
ing series.

Cynthia Byrd, being duly sworn, says that she is the PRINCIPAL CLERK of the Publisher of the NEW YORK LAW JOURNAL, a Daily Newspaper; that the Advertisement hereto annexed has been published in the said NEW YORK LAW JOURNAL in each week for 6 successive weeks, commencing on the 13th day of November, 1998.

Cynthia Byrd

TO WIT: NOVEMBER 13, 20, 27, 1998 DECEMBER 4, 11, 18, 1998

SWORN TO BEFORE ME, this 18th day
of December, 1998.

Christine A. Allen

Christine A. Allen
Notary Public, State of New York
No. 01AL5072870
Qualified in Nassau County
Commission Expires Feb. 10, 1999

CT Corporation System
350 N. St. Paul, Suite 2900
Dallas, Texas 75201
214-979-1172

Date 4-20-99

To: Sue Gilbert

FOR YOUR CONVENIENCE

I am forwarding the attached information without a transmittal letter in the belief that responsiveness may be more important to you than formality.

Sent by: Angie Mays

Remarks:

Publication Evidence

STATE OF NEW YORK

SS.:

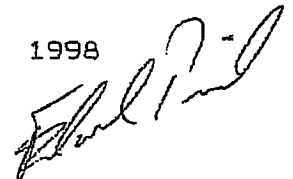
City and County Of New York,

**CREDIT
PROTECTION
ASSOCIATION, L.P.**

Notice of Application for Authority for Limited Partnership, to do business in New York State. Name: Credit Protection Association, L.P. Authority filed in New York State: October 23, 1998. Jurisdiction: Texas. Organized: July 23, 1997. New York State office location: New York County. Secretary of State of New York has been designated as agent of the limited partnership upon whom process against it may be served. The Secretary of State may mail a copy of any process against it served upon him or her to c/o C.T. Corporation System, 1635 Broadway, New York, New York 10019. C.T. Corporation System, 1635 Broadway, New York, New York 10019, is the registered agent of the limited partnership upon whom process against it may be served. Principal office: 13955 Noel Road, Suite 2100, Dallas, Texas 75240. The name and business or residence street address of each general partner is available from the Secretary of State. A copy of the certificate is filed with Secretary of State of Texas, 1019 Brazos, Room 105, Austin, Texas 78701. Purpose: Collection service, letter writing series. 11/20-12/25.

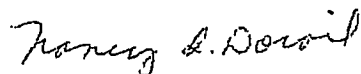
Edward Prial, being duly sworn, says that he is the Principal Clerk of the Publisher of THE CHIEF, Civil Service Leader, a Weekly Newspaper published in the County of New York; that the Advertisement hereto annexed has been regularly published in the said THE CHIEF, once in each week for:

six successive weeks, commencing on the 20 day of November 1998 to wit: November 20, 27;
December 4, 11, 18, 25, 1998



SWORN TO BEFORE ME, this 28 day

of December 1999



Nancy L. Dorvil
Notary Public, State of New York
No: 01DO6005574
Qualified in Queens County
Commission Expires April 19, 2000

**CITY OF NEW YORK
DEPARTMENT OF CONSUMER AFFAIRS**

Document No.
608358

12-BROADWAY, NEW YORK, NY 10004
The issuance and retention of this license is contingent upon the licensee's compliance with the laws of the State of New York and the City of New York, the rules and regulations of the Department of Consumer Affairs, and the rules and regulations of all Federal, State and City agencies now in effect or hereafter enacted.

License Type: **DEPT. REG. AT-TOWN AGENCY**

CITY ID: **132715369**

License Number: **1007732** Code: **122** Class: **Subclass** Issued: **12/15/2010** Expires: **01/31/2013**

Camis-ID: **106755901** Base License Number: **17** Start Date: **01/31/2010** End Date: **01/31/2013**

Item count: **1** Number of Plates: **Room Capacity** Square Footage:

Entity Name: **CREDIT PROTECTION ASSOCIATION, L.P.**

Trade Name (D/B/A):

Premises Address: **11355 NEEL ROAD, SUITE 2100, DALLAS, TX 75240**

Mailing Address:

C/O
11355 NEEL ROAD
SUITE 2100
DALLAS, TX 75240

[Signature]
Commissioner of Consumer Affairs

Not transferable without the approval of the Commissioner of Consumer Affairs.

THIS LICENSE MUST BE CONSPICUOUSLY DISPLAYED


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**Department of
Consumer Affairs**

RESULTS:

Industry: DEBT COLLECTION AGENCY Business/Individual Name: "" ZIP Code: "" License Number: 1002932

[Print](#) [New Search](#)

Displaying 1 - 1 of 1

Pages: 1

Click on any header with ↑ to sort list.

| Name ↑ | Trade Name ↑ | Industry | License # ↑ | Address | City | ZIP Code | Phone # |
|------------------------------------|------------------------------|--------------------------|-----------------------------|-------------------------|----------------------|--------------------------|-------------------------|
| CREDIT PROTECTION ASSOCIATION L.P. | | DEBT COLLECTION AGENCY | 1002932 | 13355 NOEL ROAD | DALLAS | 75240 | (972) 233-9614 |

Results 1 - 1 of 1

Pages: 1